



ASD SF  
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March 14, 2008

Mr. Kevin L. Rochlin  
Remedial Project Manager  
U.S. Environmental Protection Agency  
Region 10  
1200 Sixth Avenue, ECL-111  
Seattle, WA 98101

RE: Monthly Report: No. 141, February 2008  
Operable Unit No. 02  
Asarco Tacoma Smelter Site

Dear Mr. Rochlin:

Point Ruston is submitting this monthly report per the requirements of paragraph 48 of the Consent Decree for the above referenced site. Point Ruston will continue to provide monthly reports to EPA for the site organized in the same manner as previous reports prepared by Asarco to follow item (a) through (g) of this paragraph.

If you have any questions, please call me.

Sincerely,

Sue O'Neill  
Site Manager

Attachment (2 copies)

cc: Chung Ki Yee - Washington Department of Ecology  
Evan Griffiths - CH2MHill (2 copies)  
Richard Kauffman - ATSDR c/o U.S. EPA Region 10  
Leslie Ann Rose - Citizens for a Healthy Bay



Monthly Report No. 141, February 2008

Operable Unit 02

Asarco Tacoma Smelter Site

*A. Actions taken to achieve compliance with the Consent Decree during the previous month.*

1. A regular monthly design review meeting was not held in January.
2. Amendments to Asarco's final Upland Remediation Design (September 2006) are being prepared consistent with the Second Amendment to the Consent Decree.
3. Remedial Action activities continued.

*B. Summary of sampling, tests, and all other data received or generated by Point Ruston in the previous month.*

1. Outfall activities including the following:

Section 2.3 of the Final Statement of Work (SOW) for Remedial Design and Remedial Action – Exhibit F to the Second Amendment requires Point Ruston to continue outfall monitoring. Outfalls will be monitored to determine if the monthly average surface water outfall concentrations for arsenic, copper, and zinc exceed 0.5 ppm at the North and South site outfalls until they are abandoned.

Weekly composite samples will be collected at each outfall during the construction season. During the winter season, outfall samples will be collected every other month. Asarco began the following schedule in May of 2003 which Point Ruston will continue to implement: weekly composite samples will be collected from May-October, and in December, February, and April.

Monthly averages and individual results for samples collected by Point Ruston in February are attached. There was no exceedance of the interim discharge limits.

2. Point Ruston collects OCF leachate in a 5,000 gallon polyethylene tank for offsite shipment and disposal. LCRS and LDCRS volumes are monitored weekly in accordance with the draft OCF OMMP. LCRS volumes currently average approximately 209 gallons per day on the LCRS. Point Ruston shipped 4,500 gallons of leachate (5.6 ppm results attached) on February 7, 2007.

*C. Work Plans and other deliverables completed and submitted during the previous month.*

1. The revised Point Ruston Remediation Design was submitted to EPA on January 31, 2008.
2. No comments were received from EPA during the month of February.
3. Remedial Action during February included the following tasks:
  - OCF construction activities:

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Operable Unit 02

Asarco Tacoma Smelter Site

- Maintained leachate collection system and shipped leachate for offsite treatment as necessary to maintain adequate storage capacity in the temporary storage tank.
- Stack Hill construction activities:
  - Maintained erosion and surface water controls
  - Continued development activities, began installation of dry utilities and excavation for the first model home foundation
  - Hauled utility trench soils to lower site for use as cap materials
- Site-wide remediation activities:
  - Continued surface water controls
  - Maintained haul roads and stockpiles onsite
  - Maintained erosion and surface water controls

*D. Actions scheduled for the next six weeks.*

1. Point Ruston anticipates comments on the Stack Hill Institutional Control Plan submitted to EPA on December 20, 2007.
2. Point Ruston anticipates comments on the Sediment Capping Project – Final Construction Monitoring/As-Built Report submitted to EPA on December 31, 2007.
3. Point Ruston anticipates comments on the revised Remediation Design submitted to EPA on January 31, 2008.
- 4.
5. The following Remedial Action tasks are planned to continue:
  - RA Monitoring:
    - Outfall sampling (weekly composite samples) during scheduled months
    - Air monitoring during remedial action activities
  - OCF construction activities:
    - Continue collection of leachate for offsite disposal
    - Continue monitoring of leachate volumes
  - Stack Hill construction activities:
    - Erosion controls and site maintenance
    - Continue development activities including dry utility installation, model home construction, and paving roads
  - Site-wide construction activities:
    - Continue surface water controls
    - Maintain roads and stockpiles onsite
    - Maintain erosion controls

*E. Percentage completion, unresolved delays encountered or anticipated that may affect schedule, and efforts to mitigate delays.*

1. Point Ruston is completing permitting for the first phase of development on the lower site with the City of Tacoma.

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Asarco Tacoma Smelter Site

*F. Modifications to work plans or schedules proposed to or approved by EPA.*

1. The Second Amendment to the Consent Decree was finalized and the sale of the property to Point Ruston LLC completed on October 31, 2006.

*G. Activities undertaken to support Community Relations Plan during the previous month and planned for the next four weeks.*

1. Point Ruston attends the Town of Ruston's Town Council meetings routinely to answer question or give briefings regarding the status of RA and development planning activities (1<sup>st</sup> and 3<sup>rd</sup> Monday of each month).
2. Point Ruston is working with the City of Tacoma on development plans which incorporate remediation components for the site.
3. Point Ruston is working with MetroParks to incorporate the capping component into the Peninsula Park design.
4. Point Ruston meets with the Town of Ruston, City of Tacoma and MetroParks to address operation, maintenance, and monitoring issues at the site.

Table 1. Summary of February 2008 Outfall Data for As, Cu, and Zn Compared to SOW Limit

Location	As Conc. ppm	% of SOW Limit*	Cu Conc. ppm	% of SOW Limit*	Zn Conc. ppm	% of SOW Limit*
South Outfall	0.025	5.00%	0.030	6.00%	0.033	6.50%
North Outfall	0.000	0.00%	0.015	3.00%	0.008	1.50%

\* 0.5 ppm is the limit of As, Cu, and Zn allowed as documented in the SOW.



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Toll Free 800.735.4489 \* 406.252.6325 \* FAX 406.252.6069 \* eli@energylab.com

### LABORATORY ANALYTICAL REPORT

**Client:** Point Ruston LLC  
**Project:** Tacoma Smelter Outfall Monitoring  
**Lab ID:** B08030189-001  
**Client Sample ID:** TSM0208411 N Outfall

**Report Date:** 03/11/08  
**Collection Date:** 02/11/08 11:55  
**Date Received:** 03/04/08  
**Matrix:** Aqueous

Analyses	Result	Units	Qualifier	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	ND	mg/L		0.1		E200.7	03/06/08 19:00 / rlh
Copper	0.04	mg/L		0.01		E200.7	03/06/08 19:00 / rlh
Zinc	0.02	mg/L		0.01		E200.7	03/06/08 19:00 / rlh

**Report** RL - Analyte reporting limit.  
**Definitions:** QCL - Quality control limit.

MCL - Maximum contaminant level.  
ND - Not detected at the reporting limit.



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Zinc	0.02	mg/L		0.01		E200.7	03/06/08 19:00 / rlh

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## LABORATORY ANALYTICAL REPORT

**Client:** Point Ruston LLC  
**Project:** Tacoma Smelter Outfall Monitoring  
**Lab ID:** B08030189-002  
**Client Sample ID:** TSM0208111 S Outfall

**Report Date:** 03/11/08  
**Collection Date:** 02/11/08 11:37  
**Date Received:** 03/04/08  
**Matrix:** Aqueous

Analyses	Result	Units	Qualifier	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	0.1	mg/L		0.1		E200.7	03/06/08 19:04 / rlh
Copper	0.06	mg/L		0.01		E200.7	03/06/08 19:04 / rlh
Zinc	0.04	mg/L		0.01		E200.7	03/06/08 19:04 / rlh

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## LABORATORY ANALYTICAL REPORT

**Client:** Point Ruston LLC  
**Project:** Tacoma Smelter Outfall Monitoring  
**Lab ID:** B08030189-003  
**Client Sample ID:** TSM0208418 N Outfall

**Report Date:** 03/11/08  
**Collection Date:** 02/18/08 10:19  
**Date Received:** 03/04/08  
**Matrix:** Aqueous

Analyses	Result	Units	Qualifier	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	ND	mg/L		0.1		E200.7	03/06/08 19:08 / rlh
Copper	0.02	mg/L		0.01		E200.7	03/06/08 19:08 / rlh
Zinc	0.01	mg/L		0.01		E200.7	03/06/08 19:08 / rlh

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## LABORATORY ANALYTICAL REPORT

**Client:** Point Ruston LLC  
**Project:** Tacoma Smelter Outfall Monitoring  
**Lab ID:** B08030189-004  
**Client Sample ID:** TSM0208118 S Outfall

**Report Date:** 03/11/08  
**Collection Date:** 02/18/08 10:30  
**Date Received:** 03/04/08  
**Matrix:** Aqueous

Analyses	Result	Units	Qualifier	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	ND	mg/L		0.1		E200.7	03/07/08 17:03 / rth
Copper	0.02	mg/L		0.01		E200.7	03/07/08 17:03 / rth
Zinc	0.03	mg/L		0.01		E200.7	03/07/08 17:03 / rth

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## LABORATORY ANALYTICAL REPORT

**Client:** Point Ruston LLC  
**Project:** Tacoma Smelter Outfall Monitoring  
**Lab ID:** B08030189-005  
**Client Sample ID:** TSM0208425 N Outfall

**Report Date:** 03/11/08  
**Collection Date:** 02/25/08 08:12  
**Date Received:** 03/04/08  
**Matrix:** Aqueous

Analyses	Result	Units	Qualifier	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	ND	mg/L		0.1		E200.7	03/07/08 17:35 / rlh
Copper	ND	mg/L		0.01		E200.7	03/07/08 17:35 / rlh
Zinc	ND	mg/L		0.01		E200.7	03/07/08 17:35 / rlh

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## LABORATORY ANALYTICAL REPORT

**Client:** Point Ruston LLC  
**Project:** Tacoma Smelter Outfall Monitoring  
**Lab ID:** B08030189-006  
**Client Sample ID:** TSM0208125 S Outfall

**Report Date:** 03/11/08  
**Collection Date:** 02/25/08 08:25  
**Date Received:** 03/04/08  
**Matrix:** Aqueous

Analyses	Result	Units	Qualifier	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	ND	mg/L		0.1		E200.7	03/07/08 17:39 / rlh
Copper	0.02	mg/L		0.01		E200.7	03/07/08 17:39 / rlh
Zinc	0.03	mg/L		0.01		E200.7	03/07/08 17:39 / rlh

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## LABORATORY ANALYTICAL REPORT

**Client:** Point Ruston LLC  
**Project:** Tacoma Smelter Outfall Monitoring  
**Lab ID:** B08030189-007  
**Client Sample ID:** TSM0308403 N Outfall

**Report Date:** 03/11/08  
**Collection Date:** 03/03/08 10:51  
**Date Received:** 03/04/08  
**Matrix:** Aqueous

Analyses	Result	Units	Qualifier	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	ND	mg/L		0.1		E200.7	03/07/08 17:43 / rlh
Copper	ND	mg/L		0.01		E200.7	03/07/08 17:43 / rlh
Zinc	ND	mg/L		0.01		E200.7	03/07/08 17:43 / rlh

**Report** RL - Analyte reporting limit.  
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## LABORATORY ANALYTICAL REPORT

**Client:** Point Ruston LLC  
**Project:** Tacoma Smelter Outfall Monitoring  
**Lab ID:** B08030189-008  
**Client Sample ID:** TSM0308103 S Outfall

**Report Date:** 03/11/08  
**Collection Date:** 03/03/08 11:18  
**Date Received:** 03/04/08  
**Matrix:** Aqueous

Analyses	Result	Units	Qualifier	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	ND	mg/L		0.1		E200.7	03/07/08 17:46 / rlh
Copper	0.02	mg/L		0.01		E200.7	03/07/08 17:46 / rlh
Zinc	0.03	mg/L		0.01		E200.7	03/07/08 17:46 / rlh

**Report**  
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## LABORATORY ANALYTICAL REPORT

Client: Point Ruston LLC  
Project: Tacoma Smelter OCF Leachate  
Lab ID: B08011483-001  
Client Sample ID: TSM010821

Report Date: 01/25/08  
Collection Date: 01/21/08 11:28  
Date Received: 01/23/08  
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	5.6	mg/L		0.1		E200.7	01/24/08 20:31 / rlh

Report Definitions: RL - Analyte reporting limit.  
QCL - Quality control limit.

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ND - Not detected at the reporting limit.